

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

In re IronNet, Inc. Securities Litigation

Case No. 1:22-cv-00449-RDA-JFA

CLASS ACTION

NOTICE OF FILING OF PROPOSED ORDER

Plaintiffs respectfully advise the Court that they are filing, as an attachment to this Notice, the proposed order granting preliminary approval to the class action settlement in this matter. The text of the proposed order is materially identical to the proposed order that is part of Exhibit A to the Declaration of Laurence J. Hasson in Support of Lead Plaintiff's unopposed Motion for Preliminary Approval of Class Action Settlement and Authorization to Provide Notice to the Class, which was filed in this matter on September 23, 2024 (ECF 71-2).¹ The proposed order is now being provided as a separate document for the convenience of the Court.

¹ The year set out in the signature block has been changed from 2024 to 2025.

Dated: January 14, 2025

Respectfully submitted,

THE KAPLAN LAW FIRM

/s/ Matthew B. Kaplan

Matthew B. Kaplan (VSB # 51027)

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and the Settlement Class*

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2025, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

Dated: January 14, 2025

/s/ Matthew B. Kaplan
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